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11 Attorneys for Plaintiff  
12 United States of America

13  
14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA

16  
17 UNITED STATES OF AMERICA,  
18 Plaintiff,  
19 v.  
20 STEVEN DANIEL WOODS,  
21 Defendant.

22 CASE NO. 2:21-CR-00100-JAM  
23 STIPULATION REGARDING EXCLUDABLE  
24 TIME PERIODS UNDER SPEEDY TRIAL ACT;  
25 ORDER  
26 DATE: December 7, 2021  
27 TIME: 9:30 a.m.  
28 COURT: Hon. John A. Mendez

29  
30 **STIPULATION**

31 Plaintiff United States of America, by and through its counsel of record, and defendant, by and  
32 through defendant's counsel of record, hereby stipulate as follows:

33 1. By previous order, this matter was set for status on December 7, 2021.  
34 2. By this stipulation, defendant now moves to continue the status conference until January  
35 11, 2022, and to exclude time between December 7, 2021, and January 11, 2022, under Local Code T4.  
36 3. The parties agree and stipulate, and request that the Court find the following:  
37 a) The government has represented that the discovery associated with this case  
38 includes over one hundred pages of reports, photos, and search warrant documents. All of this  
39 discovery has been either produced directly to counsel and/or made available for inspection and  
40 copying.  
41 b) Counsel for defendant desires additional time to review the discovery with her

1 client, research and investigate possible defenses, discuss any potential resolution with her client,  
2 research mitigating evidence and present it to the prosecution, and otherwise prepare for trial.

3 c) Counsel for defendant believes that failure to grant the above-requested  
4 continuance would deny him/her the reasonable time necessary for effective preparation, taking  
5 into account the exercise of due diligence.

6 d) The government does not object to the continuance.

7 e) Based on the above-stated findings, the ends of justice served by continuing the  
8 case as requested outweigh the interest of the public and the defendant in a trial within the  
9 original date prescribed by the Speedy Trial Act.

10 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
11 et seq., within which trial must commence, the time period of December 7, 2021 to January 11,  
12 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
13 T4] because it results from a continuance granted by the Court at defendant's request on the basis  
14 of the Court's finding that the ends of justice served by taking such action outweigh the best  
15 interest of the public and the defendant in a speedy trial.

16 g)

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
19 must commence.

20 IT IS SO STIPULATED.

21  
22 Dated: November 30, 2021

PHILLIP A. TALBERT  
Acting United States Attorney

23  
24 /s/ ROSS PEARSON  
ROSS PEARSON  
25 Assistant United States Attorney  
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1 Dated: November 30, 2021

2 /s/ LINDA ALLISON  
3 LINDA ALLISON  
4 Counsel for Defendant  
5 STEVEN DANIEL WOODS  
6 (Authorized by email on  
7 November 30, 2021)

8

9 **FINDINGS AND ORDER**

10 IT IS SO FOUND AND ORDERED this 1<sup>st</sup> day of December, 2021.

11 /s/ John A. Mendez  
12 THE HONORABLE JOHN A. MENDEZ  
13 UNITED STATES DISTRICT COURT JUDGE